UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ENVIRONMENTAL CLEANUP

28 June 2012

David W. Godlewski
Vice President, Environment and Public Affairs
Teck American Incorporated
P.O. Box 3087
Spokane, WA 99220-3087

Re: Grandview Mine & Mill Removal Action

Dear Mr. Godlewski:

The purpose of this letter is to describe the work performed by the U.S. Environmental Protection Agency (EPA) on portions of the property owned by Teck American Incorporated as part of the Grandview Mine and Mill (Site) removal action.

EPA performed the removal action from 15 August 2011 through 4 October 2011 to mitigate the threat to human health and ecological receptors from exposure to mine-waste-contaminated materials. The work was completed pursuant to the project Action Memorandum signed on 10 May 2011 and the Administrative Settlement Agreement and Order on Consent signed on 10 June 2011.

Mine-waste-contaminated materials were excavated from different areas within the Site and consolidated beneath a protective barrier at an on-Site repository constructed in the Lower Mill Area. Some of the contaminated materials were removed from the Drainage Ditch and the Man-Made Ditch which are portions of the Site owned by Teck American Incorporated.

The Drainage Ditch was estimated to contain 6580 cubic yards (yds^3) of mine-waste-contaminated materials, and the Man-Made Ditch was estimated to contain 1155 yds^3 of contaminated materials. Of these amounts, an estimated 5500 yds^3 of contaminated materials were removed from the upper and middle portions of the Drainage Ditch, while 1080 yds^3 of materials were left in-place in the lower portion, and an estimated 300 yds^3 of contaminated materials were removed from the upper portion of the Man-Made Ditch, while 855 yds^3 of materials were left in-place in the middle and lower portions. The residual materials are confined to narrow, shallow accumulations of partially exposed tailings spread over a limited distance. These materials were left in-place primarily because of the unacceptable damage or disruption to the ecosystem that would have occurred with accessing and removing the materials and the minimal reduction of risk afforded by the additional cleanup.

Since the mining and milling operations at the mine ceased in the mid-1960s, the Drainage Ditch and the Man-Made Ditch have been overgrown by a variety of mature trees and understory vegetation. With few exceptions, the contaminated materials are also overlain by soil and/or a thick layer of decomposing leaves, needles, sticks, and other tree and plant debris covering the ground. The soil, along with the other plant materials, function as protective coverings, thus reducing the risk of exposure to the underlying contaminated materials. Access to the Drainage Ditch and the Man-Made Ditch is difficult because of the presence of fallen timber, vegetation, and topography. Removing the mine waste materials found in the lower portion of the Drainage Ditch and the middle and lower portions of the Man-Made Ditch would have required the widespread felling of mature trees, destruction of the understory vegetation, and destruction of the duff covering the forest floor because of access related to the size of equipment needed to excavate and haul contaminated materials. Additionally, the mine waste materials are present on a steep side slope and a vertical rock face. Removing the existing vegetation and other coverings would have likely destabilized the underlying mine waste materials, thus rendering the materials susceptible to movement onto clean and/or uncontaminated areas.

EPA determined that the minimal risks posed by the presence of the residual mine waste contaminants found in the lower portion of the Drainage Ditch and middle and lower portions of the Man-Made Ditch was outweighed by the likely adverse impacts that would have been caused by accessing and removing the contaminated materials and by the risks associated with working on steep slopes and a vertical rock face. Should there be future use of the lower portion of the Drainage Ditch or the middle or lower portions of the Man-Made Ditch or any activity which could disturb these areas, this use or activity should take into consideration the presence of the residual mining waste materials and the protections to human health and the environment provided by the overlying vegetation and other coverings.

Please do not hesitate to contact me with any questions you may have regarding this letter.

Sincerely,

Earl Liverman
Federal On-Scene Coordinator

Cc: Richard Mednick, EPA